

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARIBEL CARRASQUILLO,

Defendant.

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Civil Action No. 16-cv-05816

ANSWER

Maribel Carrasquillo, by and through her attorney, Jennifer Schultz, Esq., answer
Plaintiff's Complaint as follows:

1. Admitted.
2. Admitted.
3. Denied. This cause of action is brought on a Note. Plaintiff has not alleged that it is in possession of the note, or that it is the holder of the note or any other facts that would entitle it to collection under the Note. All of the contents of the Certificate of Indebtedness are denied. Strict proof is demanded at trial. Furthermore, Defendant denies the interest rate at 8%, and therefore denies Plaintiff's computation of accumulated interest. Strict proof is demanded at trial.
4. Denied.

FIRST DEFENSE - Complete remedy available

5. Ms. Carrasquillo is totally and permanently disabled.
6. Ms. Carrasquillo has been disabled for over 20 years.

7. The last time she successfully maintained a job was approximately 1984.
8. Ms. Carrasquillo is entitled to a complete discharge of her debt obligation under the total and permanent disability discharge procedures pursuant to 34 C.F.R. § 682.402(c).
9. Ms. Carrasquillo has submitted a Total and Permanent Discharge Application to Plaintiff's agents requesting discharge her obligation.
10. The loan discharge will constitute a total resolution of the debt and no further payment obligation will exist.

WHEREFORE, Defendant requests that the relief sought by the Plaintiff be denied, and that she be granted any other and further relief as is just and proper.

January 13, 2017
Date

/s/ Jennifer Schultz, Esq.
Jennifer Schultz, Esq.
Attorney for Defendant
Community Legal Services
1410 W. Erie Ave.
Philadelphia, PA 19140
215-227-2420

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Plaintiff,	:	
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MARIBEL CARRASQUILLO,	:	
	:	
Defendant.	:	

CERTIFICATE OF SERVICE

I, Jennifer Schultz, Esq., certify that on January 13, 2017, a copy of Defendant's

Answer in the above matter was served by electronic means to:

Rebecca Ann Solarz, Esq.
KML Law Group, PC
701 Market Street, Ste. 5000
Philadelphia, PA 19106
rsolarz@kmlawgroup.com

January 13, 2017
Date

/s/ Jennifer Schultz, Esq.
Jennifer Schultz, Esq.
Attorney for Defendant
Community Legal Services
1410 W. Erie Ave.
Philadelphia, PA 19140